RM-9267

DOCKET FILE COPY ORIGINAL

4051 Coyte Drive
Marietta, GA 30062
May 26, 1998

Office of the Secretary
Federal Comm. Comm.
Room 222
1919 M Street N.W.
Washington, D.C. 20554

Dear F.C.C.,

Please deny the recent petition RM-9267 by the Land Mobile Communication Council (LMCC) to reallocate any portion of the 70 cm band to the Private Mobile Radio Service.

I am a licensed amateur radio operator KC4EJV and the loss of any portion of the 70 cm band would affect me greatly. I do not have the money to buy any new radios. The loss of 70 cms would put me off the air

Sincerely,

Brad P. Hunt

DOCKET FILE COPY ORIGINAL

May 28, 1998

Lynn Oliver
Deputy Chief
Prevention & Preparedness
Services

Fire/Building Department
123 Fifth Avenue
Kirkland, WA 98033-6189

Tel: (425) 828-1143
Fax: (425) 828-1292
loliver@ci.kirkland.wa.us

123 Fifth Avenue
Kirkland, Washington
98033-6189

Tel: (425) 828-1100
TTY: (425) 828-2245

Ms. Magalie Salas, Secretary
Federal Communications Commissic
1919 M. Street N.W. -- MS 1170
Washington D.C. 20554

Subject: RM 9267 - Land Mob
Request for Amateur I

Dear Ms. Salas:

As the Emergency Manager for the City of Kirkland, Washington, I have occasion to work actively with the Amateur Radio Emergency Service members in this community. For the past five years we have met frequently and have created a cadre of well trained operators who know what to do to support a disaster in our community. I have never seen such a dedicated group of volunteers!

It has come to my attention that there is a group called the Land Based Mobile Communications Council which is asking that the FCC turn over those frequencies commonly used by the amateurs in their emergency exercises and in actual emergency events. These would include 420 to 430 MHz and 440 to 450 MHz.

I am sure that you realize the importance of this national network of amateur radio operators being able to function in the event of a disaster. During a major emergency our primary lines of communication are often out of service for extended times. It is the ham radio operators who have a history of coming to the aid of their communities and successfully moving essential messages along. Their responses during the Loma Prieta and Northridge earthquakes are a testimony to this fact. They are a corps of professionals who represent their communities with vigor and assurance.

I am asking that you consider this request of the Land Mobil Communications Council carefully. The loss of these essential frequencies may mean a significant disability in emergency communications for communities nation-wide.

Best regards,

Lynn M. Oliver

Lynn Oliver, Deputy Chief
Kirkland Fire Department

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05/29/98

Secretary of FCC
1919 M St. NW
Washington DC 20554

Re: RM9267

This letter is to inform you that I am opposed to the Land Mobile Communications Council being allocated any of the 70 CM bandwidth that is now allocated to Amateur Radio Operators (ARO)

ARO's voluntarily provides emerg. comm during disasters. We assist many emerg services including 911, Red Cross, National Guard, etc. FEMA also recognizes our services. The Land Mobile Communications Council would use this bandwidth for their own greedly benefit Cashing-in to make a profit at ARO's expense We have provided our time and service for free ever since Amateur Radio came into existence. We have paid for the privilege of using this bandwith from individuals who have paid hard-earned cash for 70 centi-meter equipment that would become literally useless if this proposal were to pass.

Instead, I am endorsing H.B. HR 3572 "Amateur Radio Spectrum Protection Act of 1998"

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Sincerely,
Michael F. Mertz KC8GCV
169 Maple Valley Dr
Mt. Hope, WV 25880

Corporate Office
[illegible]
P.O. Box [illegible]
Wenatchee, WA 98807
[illegible]

Omak
[illegible]

Central Communications Inc.
The Communication Professionals

(509) 762-6120

Yakima
(509) 453-[illegible]

Pasco
(509) 547-[illegible]

DOCKET FILE COPY ORIGINAL

RM-9267

May 28, 1998

Ms. Magalie Roman Salas
Secretary, FCC
Room 222
1919 M Street, NW
Washington, DC 20554

Dear Ms. Salas:

Central Communications is filing this letter in support of the Petition for Rule Making filed by the LMCC. We would like to thank the FCC for quickly making this petition public notice.

As a user of private wireless spectrum, Central Communications has a significant interest in these proceedings. Our corporate office is located in Wenatchee, Washington. We have four other locations covering eastern Washington from Canada to the Oregon border. Our company has supplied communication service to over 2000 customers for over 43 years.

Due to our vast customer territory, we use two-way radios for business coordination and employee safety. We feel that two-way radios contribute to the welfare of the community. Lack of spectrum would cause a sales decrease and would limit the amount of new customers using two-way communication. Inability to receive new spectrum could affect our customer's profits, efficiency, and safety. For example, Central Communications uses two-way radios during tower construction where other communication is not possible. With the help of two-way, we have remained accident free.

Cellular or PCS are great accessories to two-way communications in metropolitan areas. However, in rural areas they do not fulfill the needs of immediate communication or coverage that two-way communication offers now.

New spectrum would allow new businesses to emerge and older businesses to survive. Central Communications would like to urge the FCC to address these issues as soon as possible as the problems with lack of spectrum are increasing. Thank you for your consideration of this matter.

Sincerely,

Corey Martin
General Manager

MOTOROLA Radius Authorized Dealer

TRIPLE M
Communications and Electronics
P.O. Box 744
Garden City, Kansas 67846
(316) 276-8551 • (800) 585-8551

MOTOROLA 2-WAY RADIO AUTHORIZED DEALER

May 27, 1998

Ms. Magalie Roman Salas
Secretary, FCC
Room 222
1919 M Street, NW
Washington, DC 20554

Subject: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Salas:

This letter is to show my support for the Petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users. I applaud the FCC for quickly placing the petition on public notice.

My interest in these proceedings stems from my 20 plus years as a two way radio service and sales provider in southwest Kansas. We are located in Garden City, Kansas and have satellite locations in Liberal, Kansas and Ulysses, Kansas with seven employees in both sales and service. Our company covers 28 counties and takes care of over 1500 established customers.

With over 1500 established customers and new customers being added on a daily basis, the lack of spectrum is evident in every new sale we make. The private wireless spectrum in the 150 MHz, 450 MHz and 800 MHz bands is lacking the space and means to add customers with the confidence that any smart and service minded business owner wants and needs to fulfill the credence that customer satisfaction is our number one priority. We at Triple M want to ensure our customers communication and protect their profitability. The lack of spectrum can affect our customer's productivity and possible jeopardize the safety of their employees.

As stated above, our business is based in southwest Kansas. This rural community, which is built around farming and cattle production, relies heavily on the two radio systems that we provide. While cellular is present, the coverage is minimal and PCS is a great distance in the future. Accessibility to cellular for the majority of two way users is limited by tower vicinities. Let's face facts: cellular is geared to highly populated areas. It simply is not a feasible answer for our community which is spread out over a large area.

New spectrum will revitalize our system of communication. More people will be able to reap the benefits that good and reliable two way service can provide by making room for their needs. I urge the FCC to address these issues quickly as the problems associated with the lack of spectrum are increasing.

Sincerely,

Maurice M. Mayfield
Owner

CC: Senator Sam Brownback
Senator Pat Roberts
Representative Jerry Moran

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BRODIE
COMMUNICATIONS, INC.

MOTOROLA

9322 E. Dr. MLK Jr. Blvd.
Tampa, Florida 33610
(813) 628-4900 • FAX (813) 628-4344

DOCKET FILE COPY ORIGINAL

Ms. Magalie Roman Salas
Secretary, FCC
Room 222
1919 M Street, NW
Washington, DC 20554

May 29, 1998

Subject: LMCC Petition for Rulemaking (RM-9267)

Dear Ms Salas:

Being a two-way radio dealer we are very interested in this proceeding. We are located in Tampa, FL and have been in business for 41 years and have 15 employees. We provide local two-way radio sales and service in six counties and to over a thousand customers. Radio spectrum is the medium, which is necessary for our customers to communicate. Only one can talk at a time on one frequency so we need a lot of frequencies so customers do not have to wait to communicate. All of our customers do not need cellular type of radio systems. They just want a simple radio, economically priced and too just push the microphone button to talk.

By allowing more frequencies for small private systems, companies can run more efficiently and be more profitable. We must allow them the use of the airwaves with private systems.

As a small company we cannot allow large corporations to own all the frequencies that will put small companies like mine out of business.

Please allow new spectrum to fall in the hands of private users and small businesses so their companies can grow without making giant telecommunications companies rich. Please act on this proceeding in a timely fashion.

Sincerely,

John Landsberger
President
BCI Communications

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Reply Comments:
Dan Sherwood
1220 West Ave. J-14
Lancaster, CA 93534

RE: RM-9267
LMCC Petition for Rulemaking
Spectrum Reallocation to PMRS

May 28, 1998

To Whom It May Concern:

Attached is one additional copy of my submission mailed May 25, 1998. I believe I sent you one too few copies. Sorry for the inconvenience.

Sincerely,

Dan Sherwood

Northway Communications Inc.

DOCKET FILE COPY ORIGINAL

105 E. OAK STREET • WAUSAU, WI 54401 • PH.: (715) 842-0843 • FAX: (715) 848-1413 • TOLL FREE: 800-526-2138

May 21, 1998

Ms. Magalie Roman Salas
Secretary, FCC
Room 222
1919 M. Street, NW
Washington, DC 20554

Subject: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Salas:

We are filing in support of the Petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users. We applaud the FCC for quickly placing the petition on public notice.

Northway Communications, Inc. is a two-radio sales and service company that has been in business for 38 years located in Wausau, Wisconsin covering 16 of the Northern Counties in Wisconsin. We have 23 employees in sales, service and clerical. We also use the private wireless system to communicate with our employees. We have been doing this for many years because there were no other means of communication out here other than two-way radios. Our two-way radio system has been in existence since the 1960's and what it did for us as well as our customers is it gave us the opportunity to locate our service people and dispatch them to the sites. Back in the 1960's and 1970's the majority of the people using two-way radios were governmental agencies. Since we were in Northern Wisconsin, there were limited resources of very few phones, no mobile type telephones and no service available. We had to rely on the two-way radios so it was essential we got to the customer in a timely manner to take care of their needs. We used this, our own system, to communicate, as there were no other means of communication.

The lack of spectrum is really important in our operations because if you look at the areas in Wisconsin that we cover starting from Waushara County to the Michigan border, they are not covered by any other means of communications in a lot of locations. There is almost no PCS coverage there, except some cellular coverage, and the IMTS mobile telephone systems have long been out of service. So, we still have many customers that have to rely on their own communications systems for their own needs to deal with their customers. This spectrum is so important to us up here in that there are no other opportunities for many of these

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businesses to continue to achieve goals of more business and addressing the customer better. They have no means of communications with the limited resources that have been placed on this spectrum. In some cases the channels are so crowded because there are no other means. Not only has this affected the profitability of our company, but some of our users, because they cannot expand their operations. It has not only decreased their productivity but may be jeopardizing the safety of their employees.

As I have stated above, being in Northern Wisconsin, we have no PCS at all, cellular is in some areas, traveling the main arteries. When you leave the arteries there are no other means of communications in that entire area. So the only thing that we can continue to do is to help the people in northern Wisconsin to grow their business and the operations is to try to get more spectrums so they can have their own systems, not only for business but for their employee safety and more efficient operations to save fuel/vehicle expense and other issues that are associated with a lack of communications.

Finally, we feel that the need for new spectrum to bring to both our business and our customers that we would urge the FCC to address quickly the problem associated with the lack of spectrum. We understand that the metropolitan areas are covered with everything from PCS to cellular to other innovative types of communications, but being spread out in Northern Wisconsin where we have none of these benefits, it is still essential that we have more spectrum to provide customers with for the future.

Sincerely,

Donald R. Pagenkopf
President

26-May-98

DOCKET FILE COPY ORIGINAL

The Secretary
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

Ladies and Gentlemen:

SUBJECT: RM-9267

I am writing this letter in response to a notice that was just given out on our local Amateur Radio Emergency Services Training Net. I along with 63 other members of our Local Club was informed that there was a request being made by LMCC to get access to the 420-430 and 440-450 MHz Bandwidth.

I do not feel that this would be a good idea, as what the LMCC and what we as Amateur Radio Operators use this band for are not the same. I feel it would cause serious problems for the both of us. You see for the most of the people that checked into our net this evening did so Via a UHF 440 MHz link between a repeater that is 45 miles south of Duluth and over some very rough terrain. The UHF bands is very highly used in this area for links between several repeaters and let us talk over a much larger area then the VHF band does. However, with out the two of these bands we would not be able to provide the Communications for things such as:.

The National Weather Service, For sever weather watchers, or the Emergency Communications that we provide during a local Poisonous Gas spill, Or How about for the American Red Cross During Several Hurricanes and Tornadoes nation wide. None of this would be possible if we did not have these bands to use along with or VHF Bands. You see they all tie in together very nicely. It would not be a good idea to let RM-9267 to go through.

For the reasons stated beforehand, I am opposed to RM-9267.

Respectfully,

David Barschdorf
Amateur Radio Operator N0QDD

DB

Dave Barschdorf N0QDD

DOCKET FILE COPY ORIGINAL

Gregory S. Williams
3507-B Avondale Ave
Knoxville, Tennessee 37917
(423) 521-6614

RM-9267
Secretary
Federal Communications Commission
1919 M St., NW
Washington, DC 20554

To Whom It May Concern:

I am writing this letter in regards to RM-9267, the proposal of re-allocating the frequencies of 420 to 430 MHz to the Private Mobile Radio Service.

While I understand that the usage of this band is not as common as the 2-meter portion of the Amateur Bands (144-148 MHz), the understood usefulness of the 23-centimeter band may not be fully recognized.

I currently own 3 radios and accessories (antennae, cable, mounts, etc.) that amount to over $1000 in invested money towards the 23-centimeter band. I am also a SKYWARN Net Control Operator who facilitates traffic to and from the National Weather Service office in Morristown, Tennessee. The NWS office has two radios for use on the 23-centimeter band as well. If a government agency uses the 23-centimeter band, why give it to other privately funded agencies? Will these private agencies save the government money as does Amateur Radio?

Take for example on April 16, 1998. This was the day that a tornado went through nearby downtown Nashville, Tennessee. Here in Knoxville we activated SKYWARN on 147.300, 224.500, and 444.575 MHz all linked together. The net ran for a total of seven hours, with a total of 101 Amateur Operators checking in, including the National Weather Service. Given that each Amateur Operator checked in for at least one hour at a given rate of $10 per hour, with a radio averaging a cost of $200, on a system costing approximately $10,000, the time and equipment donated by Amateur Radio alone saved our local government approximately $37,270 in manpower that would have been exhausted on government agencies and expenditures here *in this city alone*. I have included the records from the April 16th SKYWARN Net for your examination.

Of course this figure is based on hypothesis and calculated figures from guessing what each individual Amateur Operator owns and operates. This figure may be slightly too much, but may also be *way below it's actual figures*. Either way, we Amateurs have saved our local government(s) time and money helping to pass vital information to the NWS and various Emergency Management Agencies in our area. Multiply this figure by 10, 15, 50 cities across the United States, and we HAMs are volunteering much more than time on what the private sector considers, "useless space".

Also, how many lives have been saved by Amateur Radio? Can anyone truly place a dollar figure on human life and say that HAM radio is not worth it? No. I personally feel that you cannot give monetary value to one's soul, no matter how insignificant that soul may be compared to the monetary value of a radio frequency.

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Amateur Radio is an asset to the community, to the country, and to the world. We HAMs are often the "last line of defense" in communications blackout. Given any disaster that has taken place over the last century, HAM operators have always been there in the shadows to provide Emergency and Health & Welfare Communications to those in need of it. By reducing our spectrum to private organizations who might perchance do nothing more than stake a claim to it and never use it, you also reduce the effectiveness of Amateur Radio entirely.

As more Amateurs are getting licensed and taking to the airwaves, the frequencies are becoming more and more crowded with HAMs wanting to enjoy the privileges they have earned and been given. By creating a "log jam" of airspace, the effectiveness of HAM radio is cut down to a minimum. Cut to the point where government agencies such as FEMA and NWS can no longer rely on HAM radio to fulfill their needs. This is not acceptable to my peers or myself. We rely on 23-centimeters as a place to go for reliable communications and traffic handling. By reducing our spectrum allocations or even considering such an act, we may be deemed unacceptable, unnecessary, and eventually, "in the way".

We have never been "in the way" before, nor should we ever be regarded as. Ask any Emergency Management Agency official or Red Cross organization in the U. S. They can speak of Amateur Radio as I speak of it to you now, with great pride and dexterity to be needed whenever they desire. Our valuable volunteerism goes without saying and beyond monetary statutes. I should hope that will be considered when the FCC takes into consideration the future of 23-centimeters to HAM radio operators and the private sector. Support Amateur Radio as Amateur Radio supports you.

Sincerely

Gregory S. Williams
KE4HSM
Amateur Operator &
SKYWARN Volunteer

SKYWARN

Net Report

Date:	April 16, 1998
Start Time:	1740 EDT (2140Z)
End Time:	0040 EDT (0440Z)
Net Control Stations:	Greg Williams, KE4HSM
	Rich Slover, ND4F
	Steve Graves, KF4BTO
Frequencies:	147.300 Mhz
	224.500 Mhz
	444.575 Mhz

Liasons:

Robert Lewis, KC4BPH	Loudon Co. EMA
KF4EKQ	NWS Morristown
Rich Slover, ND4F	Knox Co. EOC
Ingrid Slover, KD4LDL	NWS Morristown

Watches/Warnings:

Issued	***Area***	***Time***	***Expiration***
Tornado Watch #230	East TN	2 PM EDT	8 PM EDT
Tornado Watch #232	TN	4 PM EDT	10 PM EDT
Severe T-storm Wrn	Cumberland	5:20 PM EDT	6:20 PM EDT
Severe T-storm Wrn	Loudon/Roane	5:35 PM EDT	6:40 PM EDT
Severe T-storm Wrn	Anderson/Knox	6:00 PM EDT	7:05 PM EDT
Severe T-storm Wrn	Cumberland	6:20 PM EDT	7:20 PM EDT
Severe T-storm Wrn	Grainger/Union	6:25 PM EDT	7:25 PM EDT
Severe T-storm Wrn	Fentress/Morgan	6:35 PM EDT	7:40 PM EDT
Tornado Warning	Cumberland	6:35 PM EDT	7:40 PM EDT
Tornado Warning	Morgan	6:50 PM EDT	7:55 PM EDT
Tornado Warning	Claiborne	6:50 PM EDT	8:00 PM EDT
Tornado Warning	Campbell	7:10 PM EDT	7:45 PM EDT
Tornado Warning	Anderson	7:15 PM EDT	7:50 PM EDT
Tornado Warning	Grainger	7:20 PM EDT	7:55 PM EDT
Severe T-storm Wrn	Campbell	7:45 PM EDT	8:50 PM EDT
Tornado Warning	Anderson/Union	7:45 PM EDT	8:35 PM EDT
Tornado Warning	Grainger	7:55 PM EDT	8:40 PM EDT
Tornado Warning	Claiborne	8:00 PM EDT	8:45 PM EDT

Severe T-storm Wrn	Loudon/Roane	8:05 PM EDT	9:05 PM EDT
Severe T-storm Wrn	Knox	8:20 PM EDT	9:25 PM EDT
Severe T-storm Wrn	Cumberland	8:40 PM EDT	9:40 PM EDT
Severe T-storm Wrn	Jefferson/N. Sevier	8:50 PM EDT	9:55 PM EDT
Tornado Warning	Hamblen/Jefferson	9:00 PM EDT	9:39 PM ET*
Severe T-storm Wrn	Cocke/Greene	9:25 PM EDT	10:10PM ET*
Severe T-storm Wrn	Morgan	9:30 PM EDT	10:10PM ET*
Flash Flood Warning	Anderson/Campbell/Claiborne/Union		
		9:53 PM EDT	4:00 AM ET
Severe T-storm Wrn	S. Campbell	9:55 PM EDT	10:45 PM ET
Tornado Watch #239	East TN	11:00 PM EDT	3:21 AM ET*
Flash Flood Warning	Anderson/Roane	1120 PM EDT	4:20 AM ET
Tornado Warning	Blount/SE Loudon	11:50 PM EDT	12:20 AM E*
Severe T-storm Wrn	Loudon/Monroe/Roane		
		11:50 PM EDT	12:55 AM ET
Flash Flood Warning	Knox	12:35 PM EDT	3:40 AM ET

*-Denotes Watches/Warnings that were cancelled. Cancellation times are listed under expiration.

Check-Ins:

Call Sign
KC4BPH
KF4EKQ
KF4AHW
ND4F
KB4QGK
KD4LDL
WA4YRK
N4PXL
KF4BTO
KE4OTZ
N4RPR
N4RPQ
WD5FUN
KF4BFZ
WB4MXN
KF4HSV
KM4H
KA9EQL

KD4CLA
KB8RCT
KD4TNY
K4PZT
KE4RKP
KE4CQW
KD4NDB
KB4RHC
KE4RDT
WB4CTW
N4YSW
KF4CC
KE4YBY
KF4GMU
WD5Q
KC4SOX
N4UBS
KE4UHZ
KE4RKU
KF4EEB
KF4ROV
N8ESW
WB4VWO
KD4AMO
KB9EBA
KE4RCT
N4HJL
N4KKH
KD4TNX
N4HKF
K4MOB
WA4USW
KF4QMX
KF4HID
KE4KKE
WB4APL
KB4RK
KF4QYM
KF4GBS
KC4TIQ

N4IJL
KA4TAH
WA4TEM
KD4WYJ
KD4OCO
KH8CG
KF4URJ
WD4IUX
KF4BCQ
KE4YBX
KC4UZO
KS4IW
KE4SDJ
KD4NY
KB4VDT
KE4OHP
KF4VZQ
KD4ZWE
KE4OJJ
N4PWO
AC5PK
KF4PXI
AC4QE
W4GGX
K0CSJ
KA4RLV
KE4GDZ
KB4FZK
KD4MEW
AE4VP
AC4JF
KF4QYQ
KD4QXM
W4YQC
KE4DAN
KD6FBT
KF0OS
KD4VVH
KF4UAE
KF4HHP

KF4JJD
KE4MCE
KF4VYV

Net Totals:

3 NCS Stations
4 liasons
3 Tornado Watches
3 Flash Flood Warnings
15 Severe Thunderstorm Warnings
11 Tornado Warnings
101 Check-ins

James H. Mitchell 24208 Race Street Newhall, CA 91321
Phone: (805) 255-2727
E-Mail: jameshm@smartlink.net
AB6ES

DOCKET FILE COPY ORIGINAL

RECEIVED
JUN 2 1998
FCC MAIL ROOM

May 26, 1998

Secretary Magalie Roman Salas
Federal Communications Commission
Room 222
1919 M Street NW
Washington, DC 20554

Dear Secretary Salas:

I am writing in regard to RM 9267, the proposed rule making where Land Mobile would appropriate the Amateur 420 - 250 MHZ Band.

I wish to strongly OPPOSE this action. The Amateur "440 band" has been a very popular band with the amateur community and a much used band in the event of local disasters such as our Northridge Earthquake in Jan '93.

When we had our "rather large" earthquake in Southern California in January of 1993, it was NOT "PacBell" or Land Mobile or AirTouch Cellular that provided uninterrupted communications, it WAS the Amateur Radio Service and in Particular the 2 Meter and 440 Groups. The "440 system" I belong to has linked repeaters on several mountains in Southern California and those repeaters continued to work after the earthquake. I couldn't use my telephone but I could use my 440 handheld to communicate just fine.

The loss of the "440 band" to the Amateur Community would be tragic.

I have been a licensed Amateur since June of 1954 with a brief break while I was in the Service. I started out as a Novice, progressed to Technician quickly and now hold an Extra Class License.

I might not have approved of everything the FCC did over the years, however, I never felt the Commission to be "underhanded." However, this current Rule Making # 9267, I do believe is quite underhanded and I'm very disappointed to see it handled in this way. I say this because with the advent of the Internet and your own WWW Site (www.fcc.gov) virtually everything the FCC has proposed over the past several years has been posted and posted in a timely manner.

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This particular Rule Making is not only NOT POSTED, when I called and inquired as to where I could find it I was told it WOULD NOT be posted. The lack of posting of this proposed rule making to the FCC's WebSite, the short response time, and lack of publicity about it, makes me an individual wonder just what the Land Mobile Service is offering and to whom. Certainly the Land Mobile Service, as a business group, has far more financial resources than the Amateur Community, however does that mean that they are "more important" to the public, public service, general community, etc. than the Amateur Service? Or, does it simply mean that they speak "louder" with more money?

I have never had any reason to feel this way about any other FCC action or proposed action and I'm really disappointed that I have to feel this way about this one.

I hope that you will do everything in your power to help the Amateur Radio Service retain the 420 - 450 MHZ spectrum keeping in mind not only the investment the Amateur Community has in it already but more importantly the service the Amateur Community offers the public in times of need.

Thank you for your consideration and time.

Sincerely,

James H. Mitchell
AB6ES

DOCKET FILE COPY ORIGINAL

Richard Malisch AD7X
P.O. Box 53481
San Jose, CA 95153
email: AD7X@JUNO.COM

Reference : RM 9267
Proposed Relocation of Amateur Band
to Private Land Radio Service for
Commercial use.

Attn.: Secretary
FCC
Washington, DC 20554

Dear Secretary,

MY CONCERN

I am deeply troubled by the proposal to relocate the 420 mhz to 430 mhz and 440 mhz 450 mhz service away from the Amateur Radio service. This band, although shared with the government, has many advantages to the communities through out this country as an Emergency Preparedness Island. I have been a Ham Radio (emergency preparedness) operator since 1962 and have witnessed many changes to our bands. Many changes have not been in the best interest of our communities or our Radio Amateurs.

This band should remain free of commercial interests because the pursuit of making money should not force relocation and/or realignment of existing emergency services and equipment put in place over the years by radio amateurs for protection of their communities during times of disaster.

THOUSANDS OF RADIOS IN USE ON THE BAND

As the second most popular band above 30 mhz, more Hams have equipment available for these frequencies than any other band, except for the 144 mhz to 148 mhz.

WAVELENGTH HAS SPECIAL FEATURES

I have worked inside the steel and concrete buildings within Silicon Valley and know for a fact that in many instances, the shorter wavelength of this band will pass easier through the windows and steel rebar within the concrete walls. This fact is essential during emergencies such as earthquakes where clear communications mean the saving of life. I have a very clear concern that many of the systems put in place in the Silicon Valley or San Francisco Bay Area, do not take into consideration what really happens in times of disaster.

To digress for a moment, the hand-held communication radios with special bells and whistles (cell phones, pagers, message centers all in one unit) that work on

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trunking systems utilizing standard phone connections between supporting relays, will likely not function during a wide spread emergency. Example: following any large earthquake or flood or fire (we've had them all in the bay area) the phone system becomes jammed with customers all trying to use them simultaneously. Since there are more people trying to access a line than there are lines to access, the lines are removed from public access and reserved for fire, police and community supervisor use. This means the trunked systems will likely not provide the communication needed during a large disaster. For a moment, suppose you own a heavy duty earth moving equipment company and need to contact employees in the field to move their equipment to aid in excavation of survivors... your exotic trunked system will likely not have access through the cell phone towers because the connecting phone lines are restricted for emergency use. Hams rarely have this problem.

SHARING WITH COMMERCIAL INTERESTS

Sharing the 420 - 450 mhz band with commercial interests would also be a bad idea. I have had some experience with commercial users, and they generally lack training necessary to communicate well on a shared frequency. Hams with their emergency training and directed nets are amazingly efficient.

RELOCATION IS A BAD IDEA

A final note deals with relocation of thriving emergency organizations. Shortly after I became a Ham in 1962, I joined an organization in Oregon called the "Oregon Emergency Net". It was located on 3840 khz and was the center of disaster operations for the state. (VHF and UHF were not an option in those days.) Radio Amateurs from nearly every city in the state checked in at least once a day to send or receive communications traffic. Following the forced relocation of the NET to another frequency, (a more crowded frequency,) the members were unable to hear or be heard satisfactorily, forcing many to just give up. This was a big loss for Oregon, and to this day the organization has never recovered.

Please consider the thousands of communities across the Unites States of America in making this decision. Please recognize the countless hours of public service the Radio Amateurs have given on this and other bands toward the protection of these communities and reject this crazy, commercial proposal.

Sincerely,

Richard Malisch

Richard Malisch

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TWO METERS AND DOWN RADIO CLUB, INC. - W6EMM
William B. "Skip" Freely, K6HMS, Secretary/Trustee
1807 Port Wheeler Place, Newport Beach, CA 92660-6629
27 May 1997

RM 9267
Secretary, Federal Communications Commission
1919 M Street NW
Washington, DC 20554

Dear Sir/Madam:

We are writing to strongly oppose the Petition designated RM 9267 for the following reasons:

1. Our members are frequent users of the 420 - 450 MHz amateur radio band.

2. We use the band and indicated modes for the following communication purposes:

   a. FM repeaters, both mobile and fixed.

   b. FM simplex, both mobile and fixed.

   c. FM satellites, both 435/435 MHz and 435/145 MHz; CW, digital, and voice.

   d. Weak signal CW and SSB.

   e. Radio control; linking of repeaters, remote base, and models.

   f. Experimentation with equipment, antennas, and techniques.

3. Our members participate in emergency communications systems, such as the W6UE - Caltech Amateur Radio Club emergency repeater, and the Irvine, CA emergency communications team (including 2 repeaters). These systems rely heavily on the availability of the 420 - 450 MHz band for amateur radio purposes.

4. We have made significant monetary and time investments in the 420 - 450 MHz band. I personally have purchased a 145/435 MHz dual band transceiver, antennas, and other equipment valued at approximately $4000, and have designed and constructed unique receivers, transmitters, and antennas. Other members have expended significantly more than I have.

5. The value of a particular portion of the electromagnetic spectrum to amateur radio operators is significant when the characteristics are known through many hours of experimentation. Such propagation media as meteor scatter, moonbounce, tropospheric scatter, and knife-edge refraction (all of which I have personally experimented with) are better understood when they are pursued under fixed conditions, i.e., the same frequency. The loss of this band (or a portion of this band) would have a negative effect on further experimentation.

6. If the band is taken away, our emergency communications activities would be severely curtailed; I would not make a simililar investment in another band. We would view such action as capricious and arbitrary.

Thank you for the opportunity to express our concern and views. I hold an Extra class license (K6HMS), and have been licensed since 1954.

TWO METERS AND DOWN RADIO CLUB, INC.

William B. "Skip" Freely, K6HMS
Secretary/Trustee

Comments on RM-9267 petition for the immediate reallocation of 420-430 and 440-450 MHz to PMRS.

My interest in electronics started at age 13 building a Heath CB-1, then working part time for a TV repair shop, 2 way radio shop and later a TV station. After High school I went to a tech school (1966) and there I joined the school ham club. They were building a TV camera as a club project. They also had some 450 commercial radios donated that we were going to modify for amateur TV on 436 MHz. I was not really interested in Ham Radio, I had already played with CB radio in the early 60s and did not see that much difference, but being able to transmit TV did spark my interest. I did finish the cameras but did not get the radios modified before I graduated. I went to work for RCA in 1968 and got my Ham license in 1969. In 1976 I got on ATV along with another Ham I worked with, both of us using modified RCA Carfones for 436 MHz TV and prototype color TV cameras we had been working on. The camera project had been canceled and the cameras were still in early stages of development and only made color in the center of the picture but we could exchange pictures.

I helped put the ATV repeater on the air in Indy. I have played with transmitting digital TV in 1993 on 1.2GHz using a DSS set top box, did a HD DSS transmission across the lab on 1.2 GHz in 1997 and we have all the pieces to be able to transmit and receive ATSC HDTV on 439 MHz. The main thing we lack is time.

The Thomson ARC operate a 146.88 MHz repeater that has four remote receive sites that are linked on 440 MHz up to the Thomson on the north side of Indianapolis processed and linked back to the transmitter on 1.2 GHz to the transmit site 5 miles to the south. The reason for this complex arrangement is, one to provide better coverage and the remote transmitter site was caused when Thomson built a new facility on the north side of Indianapolis and we could not relocate the transmitter that far north and maintain our repeater coordination.

There was a petition earlier to reallocate part of 1.2 GHz to GPS which would affect our transmit link. If both of these were to happen it would shut our system down, It took 3 or 4 years to build what we have now and we are still working out the bugs.

With many of the services relocating to 800 MHz there is a lot of surplus 450 MHz equipment available that can be modified and used on 440 MHz for very little money. Antennas are small enough to work with and don't present a big wind load problem when

added to a tower. The main draw back is feedline cost. Usually we have around 100 foot runs of 7/8 inch Heliax which cost around 5 to 6 dollars a foot. 440 MHz performs well works through foliage.

Based on our experience building a 1.2 GHz link, it cost 2 to 3 times as much as a 440 MHz link and running any power is expensive (a 50 watt amp cost $700). Coax is another problem, losses are higher and it is hard to find a good compromise at a fair price. Running 50 watts at these frequencies would be a health concern. There is no supply of surplus 1.2 GHz equipment to work. Another problem is 1.2 GHz has to be above all the foliage, in our case the antennas are at 100 ft, which just clears the tops of the trees.

Other ham bands that could be used for links are 50 MHz, 222 MHz, 900 MHz and 2.2 GHz. Here are the drawback to these bands: 50 MHz the antennas are and present a wind load problem for tower sites and has band openings limiting its usefulness; 222 MHz when reallocated and most of the links were relocated to 440MHz; 900MHz is shared and has so much garbage on it that it is not useable for links, it might be possible to use a modified spread spectrum phone and put a 10 Watt amp on it and use it for a link; 2.2 GHz might be possible using modified MMDS LNBs and have to build our own transmitters but it would have all the problems plus of 1.2 GHz.

Indianapolis has always been a hot bed for ATV and 420 to 440 MHz is the lowest band that we can operate normal fast scan TV on. There has been an Amateur TV repeater here for at least 15 years and before that there was 20 to 30 stations operating simplex on 436 MHz.

Packet is another group that uses 440 MHz for links connect nodes. Most of these links were on 220 MHz before the reallocations. Most moved to 440 MHz when we lost half of the 220 MHz band and it was a problem to find a home for them and it still has a ripple effect that can still be seen today with links operating on what is supposed to simplex FM frequencies according to the ARRL band plan. Packet radio is adapting with many of the RF backbones are being move to the Internet and the RF nodes acting as feeders to the Internet nodes. This not is better use of the spectrum but provides a faster system.

I am not sure that I would want to develop any new hardware for 2.2 GHz at this time because if they reallocate 440 MHz and 1.2 GHz, 2.2 GHz has to be next on their list.

One other point, packet nodes are usually owned, operated and maintained by an individual unlike repeaters which are operated by a club or group to share the expense.